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January 5, 1998

Ms. Sharon Farr
HQ, 63rd RSC
Attn: AFRC-CCA-ENS (Sharon Farr)
AFRC, Building 7
P.O. Box 3001
Los Alamitos, California 90720-1301

SUBJECT: STORM WATER PROGRAM SUPPORT - REVISED SITE VISIT REPORT
USARC - LONG BEACH, CALIFORNIA
QST Project No. 6497175G

Dear Ms. Farr:

QST Environmental Inc. (QST) is pleased to provide this report to the 63rd Regional Support Command (RSC) documenting an evaluation of the applicability of the California General Storm Water Permit for Industrial Discharges (General Permit) to the above referenced U.S. Army Reserves (USAR) facility.

REGULATORY BASIS

The General Permit applies to ten categories of industries identified by the U.S. Environmental Protection Agency (USEPA) as producing a "*storm water discharge associated with industrial activity*." In addition, the General Permit applies to federal, state, or municipally owned or operated facilities that meet the description of the facilities listed in these industrial categories. Furthermore, the applicability of the General Permit is based upon the primary and auxiliary industrial activities performed at the site.

The industrial activities that typically trigger General Permit applicability for USAR facilities are vehicle maintenance, vehicle and equipment cleaning operations and/or airport deicing operations. Other associated activities include incoming vehicle storage, vehicle fueling, and material management practices - including storage procedures and loading/unloading operations. As discussed in our August 14, 1997 meeting, this evaluation of USAR facilities is based on two factors: (1) current vehicle maintenance, cleaning and/or fueling activity; and (2) the potential for storm water discharge from these work areas to a storm drain system.

FACILITY EVALUATION

On September 29, 1997, QST Environmental Inc. (QST) met with Mr. Frank Williams at the above referenced facility. Industrial activities conducted at the site were discussed during a brief meeting and tour of the facility. In addition, storm water drainage areas and discharge points were inspected. A summary of the evaluation is provided below.

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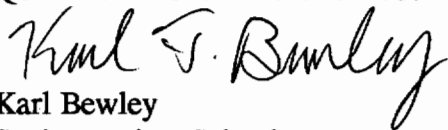
- USARC - Long Beach currently performs only minimal maintenance activities because there are no mechanics in their unit. At the time of our visit, Mr. Williams informed us that no maintenance had been conducted since 1993. If needed, vehicle maintenance is conducted at the Equipment Containment Site 16 facility - located in Los Alamitos, California.
- The facility has a wash rack which it does not currently use. At the time of our visit, QST personnel was informed that this drain is connected to an oil/water separator and the sanitary sewer system.
- There is no outdoor storage of hazardous materials at this facility. Typical solvents and cleaning materials are stored inside the maintenance building. There is one enclosed hazardous waste conex at the facility, however, no waste is generated from the vehicles.
- There are no storm drains located at the facility.

Since the facility does not have significant vehicle maintenance activity, the General Permit does not apply. This conclusion assumes that the facility activities and conditions remain as observed during this evaluation and accurate facility information was provided to QST.

This letter has been prepared by QST for the exclusive use of the 63rd RSC as it pertains to the USAR facility in Long Beach, California. Our professional services have been performed using that degree of care and skill ordinarily exercised under similar circumstances by other scientists practicing in this field. No other warranty, express or implied, is made as to the professional advice in this report. If you have any questions or require additional information, please call the undersigned at (714) 964-8722.

Sincerely,

QST ENVIRONMENTAL INC.



Karl Bewley

Senior Project Scientist

cc: Frank Williams, USARC - Long Beach
R. Gibson, U.S. Army Corps of Engineers, Mobile District

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